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Britton Lumber Company, Inc.

Wholesale Building Materials - White Pine Sawmill P.O. Box 38 7 Ely Road, Fairlee, VT 05045 802 333-4388 Fax. 802 333-4295 brittondg@sol.com

Forest Industry Telecommunications 871 Country Club Road Suite A Eugene, OR 97401

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JUL 1 9 1999

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Re. PR Docket No. 92-235
Second Memorandum Opinion and Order
Forest Industries Telecommunications opposition

I am writing to express our support for FIT's opposition of the FCC"s Second MO&O Published in the Federal Register on July 6, 1999.

Britton Lumber Company is licensed on the frequencies that are affected by the Second Memorandum and Order (2nd MO&O) which results in removing them from the Industrial/Business pool and makes frequency coordination on these channels the exclusive activity of the Petroleum (API) or Power Utilities (UTC) radio service certified coordinator.

This action takes away our choice of frequency coordinator and we feel that the FCC, in making its decision, is totally ignoring the vital, safety related activities of two-way radio in the Forest Products environment. The FCC also set no benchmarks for coordination by these coordinators and rather than promote competitive frequency coordination, is mandating the requirement that you obtain frequency coordination on your existing system from a specific coordinator.

Neither our company, as a licensee, nor FIT as a coordinator was given any advance warning of the Commission's intention to implement such a far reaching Rule Making, effectively taking away channels that licensees like yourself have been historically licensed on (over 50 years) and successfully shared with the Petroleum and Power Utility Radio Services.

We are strongly opposed to the actions of the Commission to revoke FIT''s authority to coordinate on frequencies that have been formerly allocated to the Forest Products Radio service prior to implementation of spectrum "Refarming."

Sincerely.

Douglas G. Britton

President

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July 12, 1999

Forest Industry Telecommunications 871 County Club Road Suite A Eugene, OR 97401

Re. PR Docket No. 92-235 Second Memorandum Opinion and Order Forest Industries Telecommunication opposition

Champion Pacific Timberlands Inc. (CPTI) is a Forest Products Radio Service Licensee that will be affected by the FCC's Second MO&O published in the Federal Register on July 6, 1999. CPTI fully supports Forest Industry Telecommunications' opposition of the Memorandum Opinion and Order.

On April 28 of this year, 1999, Champion Pacific Timberlands Inc. was issued a Radio Station License identified by the FCC as Conventional Industrial/Business Pool Radio Service, (Call Sign: WRL430). It is CPTI's understanding that several frequencies identified on this license could be removed from the current category and placed in a frequency coordinator category that would make these channels exclusive activity of the Petroleum (API) or Power Utilities (UTC) radio service certified coordinator.

Champion Pacific Timberlands Inc. has held these radio frequencies for over 25 years and has been a member supported by the Forest Industry Telecommunications for over 25 years. CPTI feels that the FCC would take away its' choice of frequency coordinator and is totally ignoring the vital, safety related activities of two-way radio in the Forest Products environment. The FCC has not set any benchmarks for coordination by these coordinators and rather than promote competitive frequency coordination is mandating the requirement that CPTI obtain coordination on its' existing system from a specific coordinator.

Neither CPTI, as a licensee, nor Forest Industry Telecommunications as a coordinator was given any advanced warning of the Commission's intention to implement such a far reaching rule. This decision effectively would take away channels that CPTI has been historically licensed on for over 50 years and have successfully shared with the Petroleum and Power Utility Radio Services. CPTI has

CPTI is strongly opposed to the actions of the Commission to revoke FIT's authority to coordinate on frequencies that have been formerly allocated to the Forest Products Radio service prior to implementation of spectrum "Refarming".

Sincerely,

Max Ekenberg

Vice President and General Manager of CPTI

M. L. Ebenley

cc: Jack Ward

Rich Potter